FOR REVIEW: WY Addendum 1, Phase II Draft comment letter

Hale, Jennifer to: Sam Chummar, 'Paul Bucholtz' 09/05/2008 12:31 PM
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To: Sam Chummar/R5/USEPA/US@EPA, 'Paul Bucholtz' <bucholtp@michigan.gov>
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Sender	Date	Subject
Hale, Jennifer	09/05/2008 12:31 PM	FOR REVIEW: WY Addendum 1, Phase II Draft com

Sam,

Attached for your review are the revised response to comments on the RI/FS Addendum 1, Phase II Test pit investigation. Areas highlighted in yellow have been revised based on the comments we received from you and MDEQ over the phone last Tuesday. Please let us know if we have addressed the comments as discussed over the phone. Upon receipt of your approval we will submit a hard copy of the letter and finalized text to you, with a target date by close of business on Monday, September 8.
If you have any questions please contact Jim Hutchens (262-879-1212) or I to discuss.

Best regards,

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August 8, 2008

Mr. Sam Chummar, Remedial Project Manager
U.S. EPA - Region 5
Superfund Division - Remedial Response Branch #1
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DRAFT

Subject: Plainwell Mill, Operable Unit #7, Allied Paper/Portage Creek/Kalamazoo River Site
Response to Comments on the Draft *Phase* 2 *Addendum No. 1 to the Remedial Investigation/Feasibility Study Work Plan*

Dear Sam:

Attached for your review is a red-lined version of the Draft *Phase* 2 *Addendum No. 1 to the Remedial Investigation/Feasibility Study Work Plan.* This red-lined version responds to comments that you sent to Weyerhaeuser in your letter dated July 31, 2008. We have also included a revised Figure 1 and one table from Appendix C. Finally, a description of the responses for each comment is also included within this transmittal letter. The response to your comments is provided in blue font.

Two additional documents are also included at your request: a description of the clay and riprap placed along the bank and a description of soil types by location for samples collected and analyzed during the Mill Banks Emergency Action activities in front of the Mill buildings. The information requested from Consumer's Power has not been received and will be provided to you when it is available. Applicable changes to the approved multi-area Quality Assurance Project Plan (QAPP), Field Sampling Plan (FSP), and the Spill Contingency Plan are being prepared and will be submitted as soon as they are available.

Summary of Comment Responses

- **Comment 1:** Section 2.2 - Please clarify the first paragraph on page four so that we can readily discern which structure on the Sanborn maps correspond to what you refer to as "a small storage shed." Also, please specify which Sanborn maps are included in Appendix A within the text of this section, or include the absent Sanborn Maps Appendix A.

  Response: In Section 2.2, page 4, the text has been revised to clarify the description to reflect an additional structure present in the 1928 to 1950 Sanborn maps. The structure has also been identified on all appropriate maps. Some of the Sanborns were inadvertently left out of the document; a full set of copies are attached to this letter.

- **Comment 2:** Section 2.3 - Please remove the "above applicable Part 201 criteria" from the last sentence of the paragraph.

  Response A: The wording has been changed in Section 2.3, page 4, as follows, "Comparison of the existing Phase II ESA data, depicted on Figure 1, to the applicable Part 201 criteria provides a context for evaluating the concentrations of potential COCs at the site."

  Response B: The wording has been changed in Section 2.3, page 4, as follows, "Comparison of the existing Phase II ESA data, depicted on Figure 1 and Appendix C – Historical Data Tables, to the

applicable Part 201 criteria provides a context for evaluating the concentrations of potential COCs at the site."

- **Comment 3:** Table 1 - The "Significance" column of the "RMT Plainwell Mill Banks Emergency Action" row does not contain a synopsis of the data. Please replace the existing text with a synopsis of the data. Additionally, the title of the last column could be changed to more accurately describe the information contained in that column. Finally, the sediment sample (SPD-1) from the BBL-1996 investigation is not included. It was tested for PCBs and PCDD/PCDF.

  Response: The column heading has been modified and a data synopsis added to each row. The dioxin data has been added to Table 1, Figure 1, and Appendix C.

- **Comment 4:** Section 2.4.1 - On page 5, the webpage listed at the end of the first paragraph no longer exists. A new source is needed.

  Response: In Section 2.4.1, page 5, the following source was added to provide the referenced No. 6 fuel oil characteristics: http://www.pumpschool.com/applications/fueloil.htm.

- **Comment 5:** Section 2.4.1 - In the second paragraph of page 5, please replace "significantly decreased" with an actual number. Additionally, the statement following "significantly decreased with depth" does not provide sufficient rationale as to why there are no impacts in the immediate vicinity of the 300-gallon UST. Please provide the rationale. Finally, please remove references to Part 201 Criteria.

  Response A: In Section 2.4.1, page 6, Table 2 has been added to provide the data and the text has been changed to provide numerical values as well. Comparison of the data to the applicable Part 201 criteria provides a context for evaluating the concentrations of potential COCs at the site.

  Response B – Part 201 Reference: In Section 2.4.1, page 6, Table 2 has been added to provide the data and the text has been changed to provide numerical values as well. Comparison of the data to the applicable Part 201 criteria provides a context for evaluating the concentrations of potential COCs at the site. The text has been edited to indicate "A comparison of the analytical results from the four Phase II groundwater samples to the applicable Part 201 criteria is provided in Appendix C – Historical Data Tables."

- **Comment 6:** Section 2.4.1 - In the third paragraph of page 5, please remove the references to Part 201 Criteria.

  Response A: In Section 2.4.1, page 6, the factual source of this reference as the Phase II ESA has been cited. The comparison has been reworded as follows, "As a frame of reference, Michigan Part 201 values are included in the table."

  Response B – Part 201 Reference: In Section 2.4.1, page 6, the factual source of this reference as the Phase II ESA has been cited. The comparison has been reworded as follows, "As a frame of reference, Michigan Part 201 values are included in the table and Appendix C – Historical Data Tables."

  Response C – Additional Part 201 Reference: In Section 2.4.1, page 7,

  REPLACE

"According to FTCH, no VOCs or PAHs were detected above potentially applicable Part 201 criteria. Metal analysis indicated that copper, lead, mercury, and zinc concentrations were above potentially applicable Part 201 criteria."

WITH

"A comparison of the FTCH groundwater results to the Part 201 Standards is provided in Appendix C – Historical Data Tables."

- **Comment 7:** Section 2.6 - In the first paragraph of page 7, you state that outfalls could create preferential migration pathways. In the context of this site, the text should reflect outfalls and associated subsurface conveyances as being preferential migration pathways, not as the cause of preferential migration pathways.

  Response: In Section 2.6, page 9, the text has been revised to clarify that the outfall pipe bedding and backfill can be preferential pathways and thus need to be evaluated.

- **Comment 8:** Table 2 - Please provide a source for information in this table.

  Response: In Section 2.6, page 9, the text language has been edited to identify sources of this information and the following note has been added to the table:

  Data Sources:
  1. Various Michigan Water Resource Commission Surveys (1950 - 1979)
  2. Plainwell Draft NPDES Permits and Permit Applications (1989 - 2000)

  (Table 2 is now Table 3)

- **Comment 9:** Section 3 - In paragraph 3 of page 10, you mention an inspection of a manhole, please provide: 1) a detailed discussion of the steps performed in the execution and completion of this inspection, and 2) the record of the inspection.

  Response: In Section 3, page 11, the language has been changed as follows, "A visual assessment of the manhole was conducted on May 24, 2008. This assessment included removing the manhole cover and observing the direction of underground piping. The review indicated that three underground lines were connected to the manhole, but none were consistent with the direction of the river or Metallic Object B. Photographs taken during the visual assessment are attached as Appendix E."

- **Comment 10:** Section 3 - In paragraph 1 of page 11, please delete "do not appear to be associated" and instead clarify what you meant by that phrase, i.e., are the elevated concentrations of PCB in the soil not collocated with any of the Metallic Objects.

  Response: In Section 3, page 12, the language has been changed to "are not co-located with any of the identified Metallic Objects."

- **Comment 11:** Section 4 - Page 13, bullet 2, please indicate where the electrical equipment was located.

  Response: In Section 4, page 14, the language has been revised to more clearly state that the location of this electrical equipment is not available from the reports and resources reviewed and evaluated.

- **Comment 12:** Section 4.2 - Should the CSM also take into consideration the sewer line immediately southeast of the high PCB concentrations? If not, please provide the rationale.

  Response: In Section 4.2, page 15, the language has been changed as follows, "Based upon the information described previously, the historic "Outfall Near Pump House" (noted on Figure 2) is near the location of the elevated PCB concentrations along the Mill banks and will be assessed as part of the investigation."

- **Comment 13:** Table 5 - The "Rationale" column for number three does not have any rationale for having or not having test pits. Please edit the text to include the rationale for test pits.

  Response: In Section 5.1, page 17, a sentence has been added addressing the selection of test pits for the investigative technique. In addition, on Table 6, the following text has been added, "Observations of site conditions during installation of test pits will determine if NAPL is present, and if so, does it have the potential to enter the river. Test pits will be used to identify the presence of free product or oil saturated soil." *(Table 5 is now Table 6)*

- **Comment 14:** Section 5.1, Page 17, Paragraph 3 - Please specify how the soil types will be classified and by whom.

  Response: In Section 5.1, page 19, the sentence has been modified as follows, "The test pits will be logged according to the Unified Soil Classification System (USCS) by the on-site field geologist or engineer."

- **Comment 15:** Section 5.1, Page 17, Bullets - Please specify if these are tiered in any way. Please specify how background will be determined.

  Response: These criteria are not tiered and the text in Section 5.1, page 19, has been modified to better reflect that. Background has been defined in the text as ambient air conditions which will be taken on site beyond the influence of exhaust from equipment.

- **Comment 16:** Section 5.1, Table 6 - EPA and MDEQ believe the location, number, and sampling (analytes and frequency of samples per test pit) of test pits should remain flexible to accommodate for field conditions. Also, please incorporate the possibility of digging below the water table, and sampling pooled liquids in a test pit. Please incorporate the necessary changes in the Multi-Area Quality Assurance Project Plan and other site plans.

  Response A: In Section 5.1, page 20, text has been added to allow additional flexibility for the location, number, and sampling of test pits. Additional text to address sampling pooled liquids is as follows, "The presence of water within the test pits will be logged and any visual or olfactory observations identified. If sufficient free product is observed, a product sample will be collected for physical characterization (specific gravity and viscosity) of the floating material. Since there presently are no published clean up criteria for water samples from a test pit or excavation, samples will not be collected. All of this information will be used to refine the Phase I Remedial Investigation groundwater monitoring program, if needed." The QAPP and FSP revisions are being prepared and will be submitted as soon as they are available.

  Response B – Text Regarding Number and Flexibility of Test Pits: The following notes have been added to Table 6 (pg. 18)and Table 7 (pg. 20) in Section 5.1.

Notes:

1. All test pit locations are approximate and may be moved to provide flexibility for onsite staff and personnel to respond to field conditions and observations during test pit activities.

2. When it is necessary to obtain supplemental information additional test pits may be placed, as conditions allow, to maximize visual observations at adjacent locations.

Response C – Sampling Pooled Liquids and Digging Below the Water Table: The following text is to be added Section 5.1, page 20.

"The presence of water within the test pits will be logged and any visual or olfactory observations identified. If conditions warrant, liquids present in the bottom of the test pit may be sampled for PCBs, PAHs, RCRA metals, and VOCs. It has been agreed that analytical results from pooled liquids will be collected for screening purposes and not be directly compared to existing standards. The observations and analytical results will assist in selecting future well locations. The analytical data from these wells will then be compared with appropriate Part 201 criteria.

If sufficient free product is observed, a product sample will be collected for physical characterization (specific gravity and viscosity) of the floating material. ~~Since there presently are no published clean up criteria for water samples from a test pit or excavation, samples will not be collected.~~ It is anticipated that the test pits will be placed to a depth to either intersect the groundwater or native soils. Where necessary to obtain additional data, an attempt will be made to excavate to a greater depth if conditions allow (e.g. minimal sloughing, infiltration, and low water turbidity). If test pits are excavated below the water table, removal of saturated soils from the test pit will be minimized to the extent practical. All of this information will be used to refine the Phase I Remedial Investigation groundwater monitoring program, if needed."

- **Comment 17:** Section 5.1 - Please allow for the re-interpretation of the geophysical survey data based on the test pit findings.

  Response: This comment is addressed in Section 5.2, page 21. The technical memorandum is expected to include a refinement of the Geophysical data based upon site observations along with an updated site conceptual model.

- **Comment 18:** Section 5.1, page 18, paragraph 1 calls for the off-site disposal of material. Please provide details for the characterization, storage, and schedule for removal of the material designated for disposal as well as the name and address of the facility being used for disposal. This information should be provided prior to work commencing.

  Response A: In Section 5.1, pages 20 and 21, the comment is addressed as follows, "The soil excavated while performing test pits will initially be placed on a tarp to minimize contact with surface soil. If test pit soils are visually stained or have a strong petroleum odor, excavated soils will be containerized in a small lined 5 cubic yard dumpster for landfill characterization (per Michigan guidelines). Non hazardous materials will be disposed at Waste Management Westside RDF in Three Rivers, Michigan. Material containing greater than 50 ppm of PCBs will be sent to EQ Wayne Disposal, Inc. Site #2 Landfill in Belleville, Michigan. The material will be removed within 2 weeks of landfill approval."

  Response B: In Section 5.1, pages 20 and 21, the comment is addressed as follows, "The soil excavated while performing test pits will initially be placed on a tarp to minimize contact with surface soil. If test

pit soils are visually stained, have a strong petroleum odor, or as measured with a PID indicate volatiles greater than 10 (PID Units), excavated soils will be containerized in a small lined 5 cubic yard dumpster for landfill characterization (per Michigan guidelines). After receipt of characterization data, stockpiled materials will be disposed of at an appropriate off-site landfill."

- **Comment 19:** Section 5.1, page 18, paragraph 2 - The existing site Spill Contingency Plan should be updated to consider the possibility of encountering leaking drums or underground storage tanks. Please provide an updated copy prior to the commencement of work.

  Response: In Section 5.1, page 21, a statement on the expanded contents of the Contingency Plan for response to underground conduits, drums, or tanks has been added. The Contingency Plan will be updated and submitted separately.

- **Comment 20:** Section 5.2 - As discussed with MDEQ and EPA, please limit or eliminate the groundwater portion of this focused study. EPA and MDEQ are available for additional discussions on this subject, and are also available to discuss groundwater sampling for the Remedial Investigation.

  Response: Section 5.2 has been eliminated from the Phase 2 of Addendum #1. As discussed with the EPA and MDEQ, a revised groundwater monitoring plan will be submitted to the EPA by August 20, 2008, as Phase I of the RI/FS Work Plan.

- **Comment 21:** Please provide the following, if available, prior to commencement of work: the analytical information from Consumers Power, design of the clay and rip-rap over the area, and the description of soils associated with the high PCB concentrations (*e.g.,* texture, color, residual content, organic content, etc.).

  Response: A description of the clay cap and soil types observed in the Emergency Action banks samples are included as Appendix B. The data from Consumer's Power are not available to us at this time.

I appreciate your prompt review. Please contact Kathy Huibregtse or Nathan Weber of RMT, Inc. (262-879-1212) or me if you have any questions.

cmk/enclosures

cc: Paul Bucholtz, MDEQ
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